

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ERNESTINE BROWN,)	
)	
Plaintiff,)	
)	
v.)	No. 07 C 6634
)	
WILL COUNTY SHERIFF DEPARTMENT and)	
WILL COUNTY SHERIFF PAUL J. KAUPAS,)	Judge Aspen
in his official capacity, Unknown WILL)	
COUNTY ADULT DETENTION FACILITY)	
HEALTH CARE PROVIDERS, and Unknown)	
WILL COUNTY ADULT DETENTION)	
FACILITY CORRECTIONAL OFFICERS,)	
)	
Defendants.)	

REPORT OF PARTIES PLANNING MEETING

1. Pursuant to Fed.R.Civ.P. 26(f), a meeting was held on March 28, 2008 via telephonic conference and was attended by: Patricia Nikolaros for plaintiff and Dominick L. Lanzito for defendant.
2. Pre-Discovery Disclosures. The plaintiff and defendant have exchanged the information required by Fed.R.Civ.P. 26(a)(1).
3. Discovery Plan. The parties jointly propose to the court the following discovery plan:
 - a. Plaintiff proposed she will need discovery on the following subjects:
 - i. The identity of the unknown defendant employees and agents;
 - ii. Defendants' policies and procedures pertaining to the processing and detention of individuals that are in need of medical attention and medication;

- iii. Inspection, maintenance, and repair records of defendants' vehicles that was used to transport defendant as described in plaintiff's complaint;
 - iv. Previous complaints and/or lawsuits by individuals that were denied medical attention/prescribed medication while held, detained and/or incarcerated at defendants' detention facility; and
 - v. Statements and/or testimony of eyewitnesses of the occurrences described in plaintiff's complaint.
- b. Defendants proposed they will need discovery on the following subjects:
- i. The extent and nature of plaintiff's alleged injuries, including the alleged injury suffered, when the alleged injury, and treatment for the alleged injury;
 - ii. Plaintiff's medical history and all prior existing conditions;
 - iii. The name of plaintiff's physicians, treatment rendered, date of treatment, plaintiff's diagnosis and prognosis;
 - iv. Statements and/or testimony of eyewitnesses of the occurrences described in plaintiff's complaint; and
 - v. Testimony of plaintiff's experts that support all of the allegations in plaintiff's complaint.
- c. All discovery commenced in time to be completed by October 31, 2008.
- d. The parties will propound written by April 30, 2008 and answer in accordance with the federal rules of civil procedure.

- e. Requests for admission by each party to any other party shall be served no later than thirty days before the close of discovery, unless otherwise determined by this Court.
 - f. The parties do not anticipate exceeding the maximum number of ten (10) depositions; however, the parties will ask for leave of court to take additional depositions in the event that it becomes necessary. Each deposition is limited to maximum of seven (7) hours unless extended by agreement of parties.
 - g. Reports from retained experts under Rule 26(a)(2) due:
 - i. Plaintiff by December 17, 2008; and
 - ii. Defendant by January 30, 2009.
 - h. Depositions of retained experts under Rule 26(a)(2) are to be completed as follows:
 - i. Plaintiff's expert is to be deposed by February 27, 2009,
 - ii. Defendants' experts are to be deposed by March 30, 2009.
 - i. All potentially dispositive motions should be filed by May 15, 2009.
 - j. Plaintiff and Defendants should be allowed until September 1, 2008 to join additional parties and to amend the pleadings.
4. The parties request a pretrial conference in July 2009.
5. Settlement cannot be evaluated prior to some preliminary discovery, although the parties are willing to having a conference when enough information is known.
6. The case should be ready for trial by September 2009 and is expected to take six (6) to ten (10) days.

Date: April 4, 2008

Respectfully submitted,

By: /s/ Patricia Nikolaros
Attorney for Plaintiff

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Respectfully submitted,

By: /s/ Dominick L. Lanzito
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